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**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>JANICE SHORTER, PERSONAL</b>	:	
<b>REPRESENTATIVE AND LEGAL</b>	:	<b>NO. 3:16-CV-01973</b>
<b>GUARDIAN FOR</b>	:	
<b>DONSHAY SAYLES,</b>	:	
<b>Plaintiff</b>	:	<b>(Arbuckle, M.J.)</b>
	:	<b>(Judge Mannion)</b>
<b>v.</b>	:	
	:	
<b>CHARLES E. SAMUELS, JR., ET AL.</b>	:	<b>Electronically Filed</b>
<b>Defendants</b>	:	

**UNOPPOSED MOTION FOR LEAVE TO DEPOSE FEDERAL INMATE  
PURSUANT TO FED. R. CIV. P. 30(a)(2)(B)**

Pursuant to Fed. R. Civ. P. 30(a)(2)(B), Defendants move the Court for leave to take the discovery deposition of federal inmate Joseph Wing, who is currently confined at the United States Penitentiary in Florence, Colorado, as a fact witness to the events giving rise to the allegations in Plaintiff's Complaint.

The deposition should take place at a time convenient for the Bureau of Prisons and the Parties' and in a manner authorized by the Rules of Civil Procedure.

No brief in support of this motion is required because it is filed with the concurrence of all parties in accordance with M.D. Pa. Local Rule 7.5.

Respectfully submitted,

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United States Attorney

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Dated: September 15, 2022

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JANICE SHORTER, PERSONAL	:	
REPRESENTATIVE AND LEGAL	:	NO. 3:16-CV-01973
GUARDIAN FOR DONSHAY SAYLES,	:	
	:	
Plaintiff,	:	
	:	(Judge Mannion)
v.	:	(Magistrate Judge Arbuckle)
	:	
CHARLES E. SAMUELS, JR., ET AL.	:	Electronically Filed
	:	
Defendants.	:	

## **CERTIFICATE OF SERVICE VIA ECF**

The undersigned hereby certifies that she is an employee in the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. That on September 15, 2022, she caused to be served a copy of the attached

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via the Court's Electronic Case Filing System ("ECF") and that the Addressee(s) listed below are filing users under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document, and no additional service upon the filing user is required.

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